

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LOU LIGGINS	§	
	§	CIVIL ACTION NO.
v.	§	3:20-CV-00654-S
	§	
CITY OF DUNCANVILLE, TEXAS	§	

**UNOPPOSED MOTION FOR 2-WEEK EXTENSION FOR DEFENDANT TO
FILE REPLY TO PLAINTIFF'S RESPONSE TO THIRD MOTION TO
DISMISS & REQUEST FOR EXPEDITED RULING**

NOW COMES Defendant City of Duncanville and would show as follows:

I. CURRENT DEADLINE AND 2-WEEK EXTENSION AT ISSUE

Defendant City of Duncanville filed its Third Motion & Brief to Dismiss with Supporting Appendix on April 23, 2021 (Docs 38 & 38-1). Plaintiff's Response to the Third Motion to Dismiss was filed May 7, 2021 (Doc. 41). Defendant City's Reply Brief is currently due May 21, 2021, a date which falls in the midst of pre-existing deadlines and scheduling commitments. For the reasons discussed below, counsel for Defendant City of Duncanville seeks a 2-week extension of the time to file its Reply to Plaintiff's Response to the Third Motion to Dismiss to June 4, 2021.

II. REASON FOR EXTENSION

The undersigned counsel has the following preexisting deadlines and scheduling commitments which make the current May 21, 2021 deadline very burdensome as follows:

1. Oral argument in a case in the Second Court of Appeals of Texas on May 11, 2021;
2. Def's expert designation materials in a case in the 95th District Court of Dallas County, Texas due May 11, 2021;
3. Dismissal documents in a case in the U.S. District Court, Northern District of Texas, Dallas Division due May 16, 2021;
4. Position Statement in an Equal Employment Opportunity Commission proceeding due May 19, 2021;
5. Summary Judgment Reply Brief in a case in the U.S. District Court, Northern District of Texas, Dallas Division due May 21, 2021;

6. Dispositive motion in a case in the 134th District Court of Dallas County, Texas due May 21, 2021;
7. Multiple (four) Position Statements in multiple Equal Employment Opportunity Commission proceedings due May 21, 2021;
8. Appeal Response Brief in a case in the U.S. Court of Appeals for the Fifth Circuit due May 24, 2021;
9. Full-day in-person mediation in an Equal Employment Opportunity Commission proceeding on May 25, 2021;
10. Reply briefing regarding a discovery dispute in a case in the U.S. District Court for the Northern District of Texas, Fort Worth Division due May 27, 2021;
11. Reply briefing in a case in the U.S. District Court for the Northern District of Texas, Fort Worth Division due May 28, 2021.

III. REQUEST FOR EXPEDITED CONSIDERATION

Prior to this Motion, the undersigned sent correspondence by email to Plaintiff's attorney John Coyle seeking an agreement. Mr. Coyle replied by email and stated that Plaintiff has no opposition to the requested extension. In view of the rapidly approaching May 21, 2021 deadline, the undersigned requests expedited ruling.

IV. CONCLUSION & PRAYER

For the above reasons, a 2-week extension of time is sought for Defendant City of Duncanville to file its Reply Brief in response to Plaintiff's Response to Third Motion & Brief to Dismiss. Defendant prays the Court grant the extension of time for the City to file its Reply Brief to **June 4, 2021**.

Respectfully submitted,

/s/James T. Jeffrey, Jr.
JAMES T. JEFFREY, JR.
State Bar No. 10612300
LAW OFFICES OF JIM JEFFREY
3200 W. Arkansas Lane
Arlington, Texas 76016
(817) 261-3200
Fax (817) 275-5826
**ATTORNEY FOR DEFENDANT
CITY OF DUNCANVILLE**

CERTIFICATE OF CONFERENCE

The undersigned certifies he sent correspondence by email on May 12, 2021 to Plaintiff's attorney John Coyle seeking an agreement. Mr. Coyle replied by email and stated that Plaintiff has no opposition to the requested extension. The Motion is therefore submitted to the Court for a determination.

/s/James T. Jeffrey, Jr.
JAMES T. JEFFREY, JR.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this has been served on counsel of record for all parties through the ECF System for the Northern District of Texas on this 13th day of May, 2021.

/s/James T. Jeffrey, Jr.
JAMES T. JEFFREY, JR.